

UNITED STATES DISTRICT COURT
for the
Eastern District of Pennsylvania

United States of America)	
v.)	
Jose M. Suarez-MENDOSA)	Case No. Mag. No. 20-990-1
)	
)	
)	
)	

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 11, 2020 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841(a)(1), (b)(1)(B)	Possession with intent to distribute 100 grams or more of heroin

This criminal complaint is based on these facts:

See attached Affidavit.

Continued on the attached sheet.

/s Special Agent William Doherty

Complainant's signature

William Doherty, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/12/2020 at 9am

/s Magistrate Judge Timothy R. Rice

Judge's signature

City and state: Philadelphia, PA

Honorable Timothy R. Rice, USMJ

Printed name and title

UNITED STATES DISTRICT COURT
for the
Eastern District of Pennsylvania

United States of America)	
v.)	
Jerson David DIAZ)	Case No. Mag. No. 20-990-2
)	
)	
)	
)	

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 11, 2020 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 USC § 841(a)(1), (b)(1)(B)	Possession with intent to distribute 100 grams or more of heroin

This criminal complaint is based on these facts:

See attached Affidavit.

Continued on the attached sheet.

/s Special Agent William Doherty

Complainant's signature

William Doherty, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/12/2020 at 9am

/s Magistrate Judge Timothy R. Rice

Judge's signature

City and state: Philadelphia, PA

Honorable Timothy R. Rice, USMJ

Printed name and title

UNITED STATES DISTRICT COURT
for the
Eastern District of Pennsylvania

United States of America)	
v.)	
Ezequiel REGALADO-ROSARIO)	Case No. Mag. No. 20-990-3
)	
)	
)	
)	

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 11, 2020 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

Offense Description

21 USC Section 841(a)(1), (b)(1)(A) Possession with intent to distribute 1 kilogram or more of heroin

This criminal complaint is based on these facts:

See attached Affidavit.

Continued on the attached sheet.

/s Special Agent William Doherty

Complainant's signature

William Doherty, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/12/2020 at 9am

/s Magistrate Judge Timothy R. Rice

Judge's signature

City and state: Philadelphia, PA

Honorable Timothy R. Rice, USMJ

Printed name and title

UNITED STATES DISTRICT COURT
for the
Eastern District of Pennsylvania

United States of America)
v.)
Juan CACERES) Case No. Mag. No. 20-990-4
)
)
)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 11, 2020 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

Offense Description

21 USC Section 841(a)(1), (b)(1)(A) Possession with intent to distribute 1 kilogram or more of heroin

This criminal complaint is based on these facts:

See attached Affidavit.

Continued on the attached sheet.

/s Special Agent William Doherty

Complainant's signature

William Doherty, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/12/2020 at 9am

/s Magistrate Judge Timothy R. Rice

Judge's signature

City and state: Philadelphia, PA

Honorable Timothy R. Rice, USMJ

Printed name and title

UNITED STATES DISTRICT COURT
for the
Eastern District of Pennsylvania

United States of America)	
v.)	
Ramcel DUARTE-RODRIGUEZ)	Case No. Mag. No. 20-990-5
)	
)	
)	
)	

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 11, 2020 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

Offense Description

21 USC Section 841(a)(1), (b)(1)(A) Possession with intent to distribute 1 kilogram or more of heroin

This criminal complaint is based on these facts:

See attached Affidavit.

Continued on the attached sheet.

/s Special Agent William Doherty

Complainant's signature

William Doherty, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/12/2020 at 9am

/s Magistrate Judge Timothy R. Rice

Judge's signature

City and state: Philadelphia, PA

Honorable Timothy R. Rice, USMJ

Printed name and title

UNITED STATES DISTRICT COURT
for the
Eastern District of Pennsylvania

United States of America)	
v.)	
Juan Francisco REGALADO-FERRERAS)	Case No. Mag. No. 20-990-6
)	
)	
)	
)	

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 11, 2020 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

Offense Description

21 USC Section 841(a)(1), (b)(1)(A) Possession with intent to distribute 1 kilogram or more of heroin

This criminal complaint is based on these facts:

See attached Affidavit.

Continued on the attached sheet.

/s Special Agent William Doherty

Complainant's signature

William Doherty, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/12/2020 at 9am

/s Magistrate Judge Timothy R. Rice

Judge's signature

City and state: Philadelphia, PA

Honorable Timothy R. Rice, USMJ

Printed name and title

MAG. NO. 20-990-1-6

AFFIDAVIT

I, William Doherty, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), United States Department of Justice, assigned to the Philadelphia Division. As such, I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant and an arrest warrant.

2. I have been employed as a Special Agent since April 2012 and during this time, I have received instruction and on-the-job training in various aspects of law enforcement. As part of my duties with the FBI, I investigate violations of federal criminal law over which the FBI has jurisdiction, including violent crimes, gangs, drug trafficking organizations and other violent criminal elements. Over the course of these investigations I have conducted interviews of witnesses, victims and suspects, participated in physical and electronic surveillance, utilized pen registers and trap and trace devices, applied for and received numerous search and seizure warrants and arrest warrants. I have participated in searches authorized by consent, search warrants and other legal grounds, for residences, businesses, cellular telephones and vehicles for the purpose of obtaining evidence. While employed by the

FBI, I have also participated in investigations classified under the Organized Crime Drug Enforcement Task Force (“OCDETF”), which is a national initiative focused on targeting drug trafficking organizations.

3. The facts in this affidavit come from my personal observations, my training and experience, information obtained from other agents and witnesses, review of recordings and documents and other evidence developed during the investigation. This affidavit is intended to show merely that there is sufficient probable cause for the requested arrest warrant and does not set forth all of my knowledge about this matter. Any observations not made by me, were made by other law enforcement officers involved in the investigation whom I know to be reliable and trustworthy.

4. Based on the facts set forth below, your affiant submits there is probable cause to believe that Jose M. Suarez-MENDOSA, Jerson David DIAZ, Ezequiel REGALADO-ROSARIO, Juan CACERES, Ramcel DUARTE-RODRIGUEZ, and Juan Francisco REGALADO-FERRERAS, committed the following offenses:

(a) On or about June 11, 2020, in 2911 Teesdale Street, in Philadelphia, in the Eastern District of Pennsylvania, Jose M. Suarez-MENDOSA and Jerson David DIAZ knowingly and intentionally possessed with the intent to distribute 100 grams or more of a mixture and substance containing a detectable

amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code § 841(a)(1), (b)(1)(B).

(b) On or about June 11, 2020, in 1217 Saint Vincent Street, Philadelphia, in the Eastern District of Pennsylvania, Ezequiel REGALADO-ROSARIO, Juan CACERES, Ramcel DUARTE-RODRIGUEZ, and Juan Francisco REGALADO-FERRERAS knowingly and intentionally possessed with the intent to distribute 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code § 841(a)(1), (b)(1)(A).

FACTS ESTABLISHING PROBABLE CAUSE

5. In February 2020, law enforcement officers with the FBI Philadelphia Violent Gang Task Force (VGTF), began an investigation into the CACERES drug trafficking organization (“DTO”) in the northeast section of Philadelphia, PA. As a result of this investigation, law enforcement identified 1414 Hellerman Street, Philadelphia, PA; 2911 Teesdale Street, Philadelphia, PA; 1217 Saint Vincent Street, Philadelphia, PA; and 6212 Brookview Place, Elkins Park, PA, as locations utilized by the CACERES DTO in packaging, storing and distributing heroin.

Surveillance and DEA Atlantic City Investigation

6. On April 14, 2020, law enforcement officers were conducting surveillance on the front and rear of 1414 Hellerman Street. At approximately 6:00 pm, PERSON #1¹ exited the front of 1414 Hellerman Street carrying an oversized

¹ PERSON #1 is known to law enforcement but not charged in this complaint.

brown grocery bag that appeared to be heavy based on the way she carried it. PERSON #1 walked to the rear of 1414 Hellerman Street and approached the driver's side window of a white Hyundai Elantra bearing New Jersey registration W72-CAG. PERSON #1 remained at the driver's side window but was obstructed from view from law enforcement surveillance units. When PERSON #1 reappeared into view of surveillance, she was no longer carrying the brown bag but still had her large purse. PERSON #1 returned to the front of 1414 Hellerman Street and entered her residence.

7. Your affiant knows that FBI Newark, Atlantic City Resident Agency (ACRA) and DEA Atlantic City have ongoing investigations into heroin distribution in Atlantic City. Through the course of their investigations, they identified TENNILLE LEE, charged elsewhere, as an individual that drives to Philadelphia, PA, to pick up packaged heroin. The DEA investigation confirmed that LEE traveled to Philadelphia on April 14, 2020 to pick up heroin. DEA law enforcement officers surveilled LEE in the Hyundai Elantra to the vicinity of 1414 Hellerman Street and back to a suspected stash house in Atlantic City, NJ, on April 14, 2020. DEA law enforcement officers observed LEE carry a brown bag into the suspected stash house that matched the description of the bag FBI Philadelphia law enforcement officers observed PERSON #1 carry out of 1414 Hellerman Street earlier that day.

8. On April 23, 2020, DEA Atlantic City notified your affiant that they learned LEE was traveling to Philadelphia and was believed to be picking up more heroin. DEA surveillance units maintained surveillance on LEE into the vicinity of

the 2900 block of Teesdale Street. FBI Philadelphia law enforcement maintained surveillance on 2911 Teesdale Street. At approximately 3:00 pm, the white Hyundai Elantra parked in front of 2911 Teesdale Street. A short time later, PERSON #1 exited 2911 Teesdale Street carrying a white bag that appeared full and to have significant weight. PERSON #1 placed the bag in the rear of the Hyundai Elantra and entered the front passenger seat. The Hyundai Elantra circled to the front 2911 Teesdale Street and PERSON #1 exited the Elantra without the bag she placed in the car and entered into 2911 Teesdale Street. The Hyundai Elantra then departed the area and was followed by DEA Atlantic City back to Atlantic City, NJ.

9. On April 29, 2020, DEA Atlantic City notified your affiant that LEE was headed towards Philadelphia in the same Hyundai Elantra. DEA units surveilled LEE to the vicinity of 2911 Teesdale Street. At approximately 2:12 pm, FBI surveillance units observed the Hyundai Elantra turn down the rear alley and stop behind 2911 Teesdale Street. Surveillance observed PERSON #1 exit 2911 Teesdale Street carrying a box and place it in the rear passenger area of the Hyundai Elantra. PERSON #1 remained at the driver's side briefly. As PERSON #1 returned to 2911 Teesdale Street, it appeared she had an object tucked under her arm. LEE departed in the Hyundai Elantra and was followed by DEA surveillance units back to Atlantic City, NJ.

10. On May 7, 2020, your affiant was contacted by DEA Atlantic City and advised that TENNILLE LEE was in the same Hyundai Elantra and traveling towards Philadelphia, PA. Law enforcement officers established surveillance on 2911

Teesdale Street. Surveillance units observed a white Acura MDX utilized by PERSON #1 parked in front and a Ford Explorer utilized by Juan CACERES parked in the rear of the residence. At approximately 3:35 pm, the Hyundai Elantra was observed driving down the rear alley of 2900 Teesdale Street and stopping behind 2911 Teesdale Street. PERSON #1 was observed walking out of the rear of 2911 Teesdale Street and approaching the Hyundai Elantra. PERSON #1 was observed carrying a box similar to the box she was observed carrying on April 29, 2020. PERSON #1 placed this box in the rear of the Hyundai Elantra and sat in the rear driver's side seat. After a brief period, PERSON #1 exited without the brown box and carrying a small black grocery bag and returned into 2911 Teesdale Street. The Hyundai Elantra departed the area and was followed by DEA Atlantic City surveillance personnel back to Atlantic City, NJ.

11. On May 16, 2020, PERSON #1 was observed arriving at the rear of 2911 Teesdale Street and backing into the parking space. Approximately two minutes later, at approximately 8:45 pm, a second vehicle, identified as a Mitsubishi Outlander, was captured arriving in the rear alley and stopping behind the residence. An individual, known to law enforcement as PERSON #1, was captured as she emerged from under the porch overhang carrying two bags that appeared to be weighted down. PERSON #1 was captured entering the back seat of the Mitsubishi Outlander with the two bags where she remained for a brief period. PERSON #1 then exited the rear passenger seat and the Mitsubishi Outlander departed.

12. On May 18, 2020, DEA Atlantic City Agents contacted your affiant to advise that TENNILLE LEE had rented a Mitsubishi Outlander and their investigation determined that LEE has travelled to Philadelphia on May 16, 2020 to pick up more heroin.

13. On May 18, 2020, law enforcement officers established surveillance on 1414 Hellerman Street and 2911 Teesdale Street. Law enforcement officers observed the white Acura MDX and the black Ford Explorer still parked where they had been the night before at 2911 Teesdale Street. At approximately 3:15 pm, PERSON #1 departed in her vehicle and returned to her residence, 1414 Hellerman Street.

14. Later that same evening, PERSON #1 was followed to the rear of 2911 Teesdale Street. PERSON #1 backed her vehicle under the porch. Surveillance observed movement around the side and rear of her vehicle but was uncertain if it was PERSON #1 or someone from inside 2911 Teesdale Street. After approximately one minute, PERSON #1 departed again in her vehicle.

15. PERSON #1 was followed by law enforcement back to 1414 Hellerman Street. When she arrived, PERSON #1 passed through the alley and exited onto the 1400 block of Elbridge Street and parked. PERSON #1 approached a white Subaru Legacy, PA LHJ-4538. PERSON #1 opened the rear door and put an object into the rear passenger area. PERSON #1 appeared to say something to the occupant of the Subaru and then shut the door and returned to her vehicle and then to her residence.

16. Surveillance units followed the Subaru Legacy to a cell phone store on Cottman Avenue and Belden Street. The driver exited the Subaru Legacy and was

identified as Juan Francisco REGALADO-FERRERAS. Later that evening, the Subaru Legacy was observed parked at the rear of 1217 Saint Vincent Street.

17. Approximately 10 minutes after PERSON #1 met with Juan Francisco REGALADO-FERRERAS in the Subaru Legacy, surveillance observed a Mitsubishi SUV with Maryland registration 3DX-3861 park near the front of 1414 Hellerman Street. The Mitsubishi was joined by a blue Toyota Sienna with Pennsylvania registration KCZ-4765.

18. An unknown black male exited the front passenger seat of the Mitsubishi SUV and entered the front passenger seat of the Toyota Sienna. After approximately one minute, the same unknown male returned to the Mitsubishi and the vehicle pulled into the rear alley of 1414 Hellerman Street and parked next to PERSON #1 in her white Acura MDX. The Toyota Sienna remained parked on Hellerman Street.

19. A surveillance unit in the rear alley observed PERSON #1 exit her vehicle and retrieve a large red bag from the rear of her vehicle. The red bag appeared to be weighted down. PERSON #1 passed the red bag through the passenger window of the Mitsubishi. The Mitsubishi then departed from the rear alley and the Toyota Sienna passed through the rear alley. The Toyota Sienna and the Mitsubishi separated and law enforcement maintained surveillance on the Mitsubishi SUV. This vehicle was followed by law enforcement to a neighborhood in West Philadelphia, in the vicinity of 52nd Street and Media Street where surveillance units lost sight of it.

20. On May 27, 2020, DEA Atlantic City notified your affiant that TENNILLE LEE was traveling in a rented Mitsubishi Outlander towards Philadelphia and DEA surveillance units were following her. LEE was identified driving the white Mitsubishi Outlander bearing NJ registration B59-LPV. At approximately 5:00 pm, a white Mitsubishi Outlander bearing NJ registration B59-LPV turned down the rear alley of the 2900 block of Teesdale Street and stopped at the rear of 2911 Teesdale Street.

21. At approximately 5:05 pm, the white Acura MDX was electronically surveilled from the vicinity of 6212 Brookview Place, Elkins Park to 1217 Saint Vincent Street. The driver, identified as Juan CACERES, was observed driving up the rear alley of 1217 Saint Vincent Street and making a u-turn before parking at the rear of 1217 Saint Vincent Street. The driver remained in the vehicle. A male identified by law enforcement as REGALADO-FERRERAS was observed walking from the direction of the side entrance of 1217 Saint Vincent Street to the driver's side window of CACERES' vehicle. The unknown male remained at the side of the Acura MDX for a brief period and then appeared to return into 2911 Teesdale Street.

22. CACERES departed in the Acura MDX from the rear alley and was surveilled to 2911 Teesdale Street and parked in front of the residence. CACERES exited the white Acura MDX wearing a black and grey zip-up sweatshirt. CACERES carried a tan colored canvass bag that appeared to be weighted down based on the way it swayed as CACERES carried it. As CACERES approached the front of 2911 Teesdale Street, Jose M. Suarez-MENDOSA appeared from the entrance area to 2911

Teesdale Street. MENDOSA approached CACERES with a white bag that appeared to be weighted down and full. CACERES and MENDOSA met at the walkway to 2911 Teesdale Street and the white bag was placed inside the tan colored canvas style bag that CACERES carried. Both individuals then turned and walked back towards the side entrance to 2911 Teesdale Street.

23. Within seconds of disappearing from view at the front of the house, CACERES was observed exiting the breezeway behind 2911 Teesdale Street and approaching LEE in the Mitsubishi Outlander. CACERES was observed carrying what appeared to be the same tan colored canvas bag. The bag still appeared to be weighted down and filled. CACERES was observed entering the passenger seat of the Mitsubishi Outlander and placing the bag in the rear passenger area.

24. The Mitsubishi Outlander, driven by LEE, proceeded to the end of the alley and CACERES was observed pointing for LEE to turn left. The Mitsubishi Outlander turned onto Brous Street and then made an immediate turn onto Teesdale Street and stopped near the front of 2911 Teesdale Street. CACERES was observed exiting the passenger seat and returned to his vehicle. LEE subsequently departed the area and was followed by DEA surveillance units back to her known residence in Atlantic City, NJ.

25. CACERES remained in the white Acura MDX for a brief period and then departed. CACERES was observed driving around the immediate neighborhood before returning to the rear of 2911 Teesdale Street and backing in under the porch overhang. A third male, believed to be Jerson David DIAZ, exited the rear of 2911

Teesdale Street and appeared to look towards Brous Street before disappearing from view back in the residence.

26. On May 30, 2020, at approximately 4:00 pm, DEA Atlantic City began conducting surveillance on TENNILLE LEE as she rented a white Mitsubishi Outlander near Atlantic City and began to travel towards Philadelphia. At approximately 4:21 pm, the white Acura MDX departed the vicinity of 6212 Brookview Place and was electronically tracked to the front of 2911 Teesdale Street. An individual known to law enforcement as Juan CACERES exited the driver's door of the white Acura MDX and walked up the walkway to the side entrance of 2911 Teesdale Street. At approximately 4:44 pm, a white Mitsubishi Outlander with New Jersey registration B59-LPV, and under DEA Atlantic City surveillance, arrived at the rear of 2911 Teesdale Street and backed in under the porch. At approximately 4:48 pm, CACERES appeared at the rear passenger door and opened it and appeared to place something inside the rear passenger side and shut the door. CACERES then entered the front passenger seat and closed the door. After approximately one minute, CACERES exited and disappeared from view at the rear of 2911 Teesdale Street. The Mitsubishi Outlander pulled out of the rear parking spot and departed the area. LEE in the Outlander was then followed by DEA Atlantic City back to her known residence in Atlantic City, NJ.

27. On June 1, 2020, DEA Atlantic City executed a search warrant at TENNILLE LEE's residence in Atlantic City, NJ. The warrant was issued by the

Honorable Bernard E. DeLury Jr., Presiding Judge of Superior Court, of the County of Atlantic, State of New Jersey

28. As a result of the search warrant, DEA Atlantic City seized approximately 390 “bricks” of heroin with approximately 19,500 packets, or 595 grams of heroin. The heroin collected was stamped “Dusse.” Your affiant offers that this heroin was provided to LEE by CACERES on May 30, 2020.

FBI Search Warrants Executed on June 11, 2020

29. On June 5, 2020, your affiant obtained eight federal search warrants (20-MJ-949-01/08) for 1414 Hellerman Street, 2911 Teesdale Street, 1217 Saint Vincent Street, Philadelphia, PA, and 6212 Brookview Place, Elkins Park, PA. These warrants were authorized by the Honorable Elizabeth T. Hey, United States Magistrate Judge. On June 11, 2020, FBI Philadelphia squad C3, VGTF, executed the authorized federal search warrants.

30. At 2911 Teesdale Street, law enforcement encountered Jose M. Suarez-MENDOSA and Jerson David DIAZ. Both individuals were detained after being called down from the second floor where the bedrooms are located. MENDOSA was wearing a pair of red shorts that law enforcement observed him in on numerous occasions. In the basement of the residence, law enforcement recovered a large black duffle bag with a significant amount of drug packaging paraphernalia including coffee grinders, scales, stamps, glassine baggies, scotch tape, strainers and related items. Law enforcement also recovered approximately 5,442 packets of suspected heroin. These packets of suspected heroin were packaged identical to the packaged heroin

recovered by DEA Atlantic City. The heroin in Atlantic City and the heroin in 2911 Teesdale Street had the identical stamp of "Dusse."

31. Based on known individual heroin bag weight, law enforcement estimate the packaged heroin in basement had a bulk weight of approximately 163 grams. In addition, law enforcement recovered approximately 25 grams of suspected bulk heroin from the basement. The suspected heroin has been submitted to the Philadelphia Police Crime Lab for further analysis. I know that heroin is often mixed with fentanyl for redistribution. Due to the potential exposure to fentanyl, the suspected heroin was not field tested. I believe based on the color, size, and consistency of the suspected heroin, the manner of packaging, drug packaging paraphrenalia found in the residence, and other facts in this investigation that the substance is a mixture of heroin, a Schedule I controlled substance. Based on my training and experience, I believe this quantity of heroin is not for personal use and is consistent with drug trafficking and distribution.

32. Inside of 1217 Saint Vincent Street, law enforcement detained Ezequiel REGALADO-ROSARIO, Juan CACERES, Ramcel DUARTE-RODRIGUEZ, and Juan Francisco REGALADO-FERRERAS. All four individuals appeared to have fled from the basement to the first and second floor of the residence when law enforcement approached the residence. Law enforcement encountered REGALADO-ROSARIO on the first floor near the entrance to the stairs leading to the basement. DUARTE-

RODRIGUEZ was located in the kitchen and CACERES and REGALADO-FERRERAS were located in a bedroom on the second floor.

33. In the basement, law enforcement located a large-scale heroin packaging operation. Law enforcement observed multiple bagging stations setup and thousands of heroin packets in various stages of packaging. At the various stations, law enforcement observed several cell phones that had been left. One cell phone had what appeared to be a YouTube video playing as law enforcement entered the basement. Law enforcement also observed suspected bulk heroin, grinders, scales, cut straws for packing the baggies and other paraphernalia. In the middle of the table, law enforcement observed a table that was displaying camera feeds for four different cameras around 1217 Saint Vincent Street. Law enforcement noted that thousands of packets of heroin in the middle of the table had been doused with water resulting in a grey-ish mud of suspected heroin. Your affiant avers that CACERES and the others observed law enforcement approaching the residence to execute the warrant and attempted to destroy as much evidence as possible by dumping water on the table.

34. As a result of the search warrant, law enforcement recovered approximately 16,500 packets of heroin that was packaged for distribution and not doused in water. For law enforcement safety, the doused heroin packets were not counted but were estimated to be between 30,000 and 38,000 packets based on the weight of the packets combined. In total, law enforcement recovered approximately 200 grams of suspected bulk heroin and approximately 1.4 kilograms of packaged

heroin from the basement. The suspected heroin has been submitted to the Philadelphia Police Crime Lab for further analysis. Due to possible exposure to fentanyl, the suspected narcotics were not field tested. I believe based on the color, size, and consistency of the suspected heroin, the manner of packaging, the drug packaging stations and paraphernalia found in the residence, and other facts in this investigation that the substance is a mixture of heroin, a Schedule I controlled substance. Based on my training and experience, I believe this quantity of heroin is not for personal use and is consistent with drug trafficking and distribution.

35. In addition, during the search of the residence, law enforcement officers recovered a Glock 42, .380 caliber, serial number ACFP345 from the front master bedroom. This gun was loaded with six rounds and an additional box of 50 rounds.

36. During the search of 1217 Saint Vincent Street, law enforcement also identified two children, approximately four years old and approximately two months old. These children appeared to live at the residence.

37. At 6212 Brookview Place, Elkins Park, PA, law enforcement detained PERSON #2² as the only adult in the residence. Law enforcement also observed two young children. PERSON #2 confirmed that CACERES spends time at the residence and has a key to the residence. Inside the bedroom, law enforcement observed men's clothing in the closet. On the floor of the closet, law enforcement recovered approximately 1.19 kilograms of suspected heroin. The heroin was recovered in a bag underneath a black and grey zip-up sweatshirt. CACERES was observed wearing this

² PERSON #2 is known to law enforcement but not charged in this complaint.

sweatshirt during the course of the investigation on numerous occasions while at 1414 Hellerman Street and 2911 Teesdale Street.

38. Law enforcement observed photographs of CACERES and PERSON #2 on the refrigerator and PERSON #2 confirmed she was in a relationship with CACERES. When asked where the heroin came from, PERSON #2 advised law enforcement to ask CACERES. PERSON #2 also said that CACERES had another girlfriend. PERSON #2 admitted to helping translate for CACERES as he brokered narcotics prices between a customer in Atlanta. PERSON #2 estimated that occurred several months prior. PERSON #2 said she told CACERES she did not want to be a part of brokering deals and she told the other girlfriend to take over the negotiations with customers. PERSON #2 said her cell phone would have text messages confirming what she was saying.

39. Inside the children's bedroom, law enforcement officers recovered a bag containing approximately \$38,000 in United States Currency. The USC was banded in a manner consistent with money involved in drug trafficking and money laundering. The suspected heroin was submitted to the Philadelphia Crime Lab for further analysis. Due to the potential exposure to fentanyl, the suspected heroin was not field tested. I believe based on the color, size, and consistency of the suspected heroin, the manner of packaging, and other facts in this investigation that the substance is a mixture of heroin, a Schedule I controlled substance. Based on my

training and experience, I believe this quantity of heroin is not for personal use and is consistent with drug trafficking and distribution.

40. Law enforcement also located a hidden compartment inside a nightstand. Inside the compartment, law enforcement recovered a box of 9mm ammunition.

41. Inside 1414 Hellerman Street, law enforcement detained PERSON #1. PERSON #1 requested to speak with her attorney prior to speaking with law enforcement. While law enforcement did not recover narcotics from 1414 Hellerman Street, your affiant has presented numerous occasions where PERSON #1 was believed to be engaged in heroin distribution in furtherance of the CACERES DTO operation.

CONCLUSION

42. Based on the foregoing facts, there is probable cause to believe that:

(a) On or about June 11, 2020, in 2911 Teesdale Street, in Philadelphia, in the Eastern District of Pennsylvania, Jose M. Suarez-MENDOSA and Jerson David DIAZ knowingly and intentionally possessed with the intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code § 841(a)(1), (b)(1)(B).

(b) On or about June 11, 2020, in 1217 Saint Vincent Street, Philadelphia, in the Eastern District of Pennsylvania, Ezequiel REGALADO-ROSARIO, Juan CACERES, Ramcel DUARTE-RODRIGUEZ, and Juan Francisco

REGALADO-FERRERAS knowingly and intentionally possessed with the intent to distribute 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code § 841(a)(1), (b)(1)(A).

Respectfully submitted,

/s Special Agent William Doherty

William Doherty
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me
on June 12, 2020 at 9am

/s Magistrate Judge Timothy R. Rice

Honorable Timothy R. Rice
United States Magistrate Judge